

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

|                           |   |                               |
|---------------------------|---|-------------------------------|
| UNITED STATES OF AMERICA, | ) |                               |
|                           | ) |                               |
| Plaintiff,                | ) |                               |
|                           | ) |                               |
| vs.                       | ) | CRIMINAL NUMBER: 15-30164-DRH |
|                           | ) |                               |
| JERRY LANE AKIN,          | ) |                               |
|                           | ) |                               |
| Defendant.                | ) |                               |

**STIPULATION OF FACTS**

Comes now James L. Porter, Acting United States Attorney for the Southern District of Illinois through Norman R. Smith, Assistant U.S. Attorney for this District and herewith enter into the following Stipulation of Facts with the defendant, Jerry Lane Akin, represented by his attorney David Brengle, pertaining to the relevant conduct of the defendant within the scope of U.S.S.G. §1B1.3.

1. From in or about 2012 and continuing through March, 2014, in St. Clair County, Illinois, within the Southern District of Illinois, and elsewhere, Jerry Lane Akin caused the foreseeable use of interstate wire communications in furtherance of a scheme to defraud and to obtain money and property by means of fraudulent representations.

2. Jerry Lane Akin worked as an office manager for a doctor's office in Belleville, Illinois from approximately the Fall of 2009 through the Spring of 2014. As office manager he was authorized to sign checks and use a company credit card for business purposes only.

3. As part of the scheme to defraud, Jerry Lane Akin would and did charge personal purchases to the company's credit card that included Cardinal baseball season tickets, concert tickets, medical bills and personal travel expenses.


4. As part of the scheme to defraud, Jerry Lane Akin would and did pay personal credit card bills using the business checking account. He attempted to conceal the payments by altering the payee of the checks in the business' QuickBooks accounting software.


5. As part of the scheme to defraud, Jerry Lane Akin would and did pay himself excess salary.

6. On or about January 8, 2014, in St. Clair County, Illinois, within the Southern District of Illinois, and elsewhere, Jerry Lane Akin did cause the foreseeable use of interstate wire communications in furtherance of a scheme to defraud and to obtain money and property by means of fraudulent representations by fraudulently issuing a check on or about January 3, 2014 from the business account at Regions Bank in Belleville Illinois to Citi Bank, Des Moines, Iowa, causing a fraudulent transfer of funds to pay for the personal credit card of Jerry Lane Akin.

7. On or about September 27, 2013, in St. Clair County, Illinois, within the Southern District of Illinois, and elsewhere, Jerry Lane Akin did cause the foreseeable use of interstate wire communications in furtherance of a scheme to defraud and to obtain money and property by means of fraudulent representations by fraudulently using the business credit card account to purchase Cardinal Baseball tickets.


SO STIPULATED:

  
JERRY LANE AKIN  
Defendant

  
DAVID BRENGLE  
Attorney for Defendant

Date: 05/26/2016

JAMES L. PORTER  
Acting United States Attorney

  
NORMAN R. SMITH  
Assistant United States Attorney

Date: 5/26/2016